

EXHIBIT 3

Marthee J. Sansone

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

IN RE DEPAKOTE CASES:)
)
RHEALYN ALEXANDER, et al.,)
) No. 12-cv-52-NJR-SCW
Plaintiffs,)
)
v.)
)
ABBOTT LABORATORIES, INC.,) No. 12-cv-53-NJR-SCW
et al.,)
)
Defendants.)

VIDEO DEPOSITION OF MARTHEE J. SANSONE

January 18, 2017
9:59 a.m.

Reporter: Jude Arndt, CSR, RPR
CSR No. 084-004847

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1 A. It will be 15 years this year.

2 Q. And this year, you mean 2017?

3 A. That's correct.

4 Q. T.S. -- is that T.S. or T.S. ?

5 A. T.S..

6 Q. That's the spelling I like. What is
7 T.S. 's birth date?

8 A. [REDACTED].

9 Q. And A.S. 's birth date is [REDACTED]?

10 A. That's correct.

11 Q. Is A.S. an A.S. or a A.S. ?

12 A. He's an A.S. .

13 Q. Then we'll call him an A.S. .

14 A. Thank you.

15 Q. I know how people are about those names.

16 I was an Andrew growing up, but now I don't seem to
17 have any control over what people call me. You were on
18 Depakote, ma'am, as of your pregnancy with T.S. ;
19 right?

20 A. That's correct.

21 Q. And do you recall the dosage that you were
22 on during your pregnancy with T.S. ?

23 A. She had me on a low dosage. I believe
24 around 500 milligrams is what I was on with him.

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1 T.S. 's autism?

2 A. Dr. Gregory did.

3 Q. Dr. Gregory Robinson?

4 A. Yes. Thank you.

5 Q. You're welcome. Work together, we'll get
6 through this. Did Dr. Robinson say to you whether
7 autism or Asperger's were the same or different?

8 A. He was high-functioning autism with
9 Asperger's and then the ADHD.

10 Q. And Dr. Robinson also diagnosed the ADHD?

11 A. Correct.

12 Q. With respect to the autism or ADHD, has
13 anyone said that those are related to Depakote?

14 A. I've never asked.

15 Q. Well, I understand that, but no one has
16 ever said they are?

17 A. No.

18 Q. And you never asked about the Asperger's?

19 A. No.

20 MR. GENDRON: No claims being asserted
21 with regard to T.S. , counsel?

22 MS. WILLIAMSON: This case that we're here
23 for today is just for A.S. .

24 MR. GENDRON: I understand --

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1 MS. WILLIAMSON: We have not filed a case
2 for T.S. today; correct.

3 MR. GENDRON: Okay.

4 Q. (By Mr. Gendron) Were the autism and ADHD
5 diagnoses also in 2012?

6 A. Yes.

7 Q. And you said that T.S. is
8 high-functioning?

9 A. Correct.

10 Q. Is he in a regular school environment?

11 A. Yes.

12 Q. Is he -- does he have any special classes?

13 A. Yes.

14 Q. Does he have an IEP?

15 A. Yes.

16 Q. You know what an IEP is?

17 A. Yes, I do.

18 Q. Does he seem to be on track
19 developmentally?

20 A. Yes.

21 Q. And again, although I'm somewhat
22 math-challenged, he's almost 16?

23 A. 13.

24 Q. 13?

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1 A. Correct.

2 Q. And you understand PDR is Physicians' Desk
3 Reference?

4 A. Yes.

5 Q. Have you ever heard of the Physicians'
6 Desk Reference before today?

7 A. No.

8 Q. Flip one page in, please. And do you see
9 there on page -- on the upper left-hand corner of the
10 page, it should say 434.

11 A. Yes.

12 Q. And in the third column of Page 434,
13 there's an entry starting for Depakote tablets. Do you
14 see that, third column? All the way to the right.

15 A. Oh, the right. I'm sorry. Yes.

16 Q. Depakote is the medication that you were
17 on in January-February of 2004 and through your
18 pregnancy with A.S. ?

19 A. Correct.

20 Q. Now, flip with me, if you would, please,
21 to the very last page, Page 440 of Exhibit Four.

22 MS. WILLIAMSON: Back page.

23 MR. GENDRON: Back page. That's right.

24 Thank you, counsel.

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C E R T I F I C A T E

3

4 I, JUDE ARNDT, a Certified Shorthand
5 Reporter, do hereby certify that prior to the
6 commencement of the examination, MARTHEE J. SANSONE was
7 sworn by me to testify the truth, the whole truth and
8 nothing but the truth.

9 I DO FURTHER CERTIFY that the foregoing is a
10 true and accurate transcript of the proceedings as
11 taken stenographically by and before me at the time,
12 place and on the date hereinbefore set forth.

13 I DO FURTHER CERTIFY that I am neither a
14 relative nor employee nor attorney nor counsel of any
15 of the parties to this action, and that I am neither a
16 relative nor employee of such attorney or counsel, and
17 that I am not financially interested in this action.

18

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JUDE ARNDT, CSR, RPR

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CSR No. 084-004847

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